

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

NORTHMOBILETECH LLC,)
)
Plaintiff,) Case No. 11-CV-291
)
vs.) JURY TRIAL DEMANDED
)
GENERAL GROWTH PROPERTIES, INC.,) Hon. William M. Conley
)
Defendant.)

**DEFENDANT GENERAL GROWTH PROPERTIES, INC.’S MOTION FOR SUMMARY
JUDGMENT OF INVALIDITY AND NON-INFRINGEMENT**

Defendant General Growth Properties, Inc. (“GGP”), by its undersigned counsel, hereby moves this Court for an order that (1) claims 1, 3, 17, and 19 of U.S. Patent No. 7,805,130 (“the ‘130 patent”) are not infringed; and (2) claims 1, 3, 17, and 19 of the ‘130 patent are invalid as anticipated in light of the prior art. In making this motion, GGP respectfully requests that the Court enter judgment in its favor with regard to: (1) Plaintiff NorthMobileTech LLC’s (“NMT”) claims of infringement of the ‘130 patent, set forth in NMT’s Complaint (Dkt. No. 1); (2) GGP’s First and Second Affirmative Defenses of Non-Infringement and Invalidity, set forth in GGP’s First Amended Answer and Counterclaims (Dkt. No. 34); (3) GGP’s Counterclaim for Non-Infringement, set forth in GGP’s First Amended Answer and Counterclaims (Dkt. No. 34); and (4) GGP’s Counterclaim for Invalidity, set forth in GGP’s First Amended Answer and Counterclaims (Dkt. No. 34).

The bases for GGP’s Motion are further set forth and supported in the accompanying documents, submitted herewith: Brief in Support of General Growth Properties, Inc.’s Motion for Summary Judgment; Proposed Findings of Fact in Support of General Growth Properties, Inc.’s Motion for Summary Judgment of Invalidity and Non-Infringement; the Declaration of

Helena D. Kiepura in Support of General Growth Properties, Inc.'s Motion for Summary Judgment; the Declaration of Jeffry Cloud; the Declaration of Dr. Richard N. Taylor and his accompanying expert reports; the Declaration of Ricky Hussmann, Jr. and his accompanying expert report; and the Transcript of the Deposition of Ricky Hussmann, Jr.

GGP respectfully requests that the court grant its Motion for Summary Judgment of Invalidity and Non-Infringement.

Dated: April 10, 2012

Respectfully submitted,

s/ Mark. A. Pals, P.C.

Mark A. Pals, P.C. (IL 6201751)
Eric D. Hayes, *pro hac vice*
Helena D. Kiepura, *pro hac vice*
KIRKLAND & ELLIS LLP
300 North LaSalle Street
Chicago, Illinois 60654
Telephone: (312) 862-2000
Attorneys for General Growth Properties